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April 9, 2020

Honorable Thomas J. McAvoy
United States District Court
Northern District of New York
Federal Building and U.S. Courthouse
15 Henry Street
Binghamton, NY 13901

Re: *NRA v. Cuomo, et al*
Northern District of New York
18-CV-566 (TJM)(CFH)

Dear Judge McAvoy:

I write to request a two-week extension of time until April 28, 2020, for the Defendants to file any motion for reconsideration, relative to the Court's recent decision directing that certain documents be produced for in camera review. [Dkt. 188]. The Defendants are currently considering whether to file such a motion, particularly to highlight for the Court the immense burden that will be placed on the Defendants should they be required to comply with the Plaintiff's requests, which the Court has described as being tantamount to a fishing expedition.

The current health crisis has made it particularly difficult for Defendants to make this assessment in short order. Additional time is needed to accurately identify the effort that will be required to comply with the Court's order, which is hindered by our current difficulties in gaining access to custodians and their records. Given the foregoing, the Defendants respectfully request that the Court grant the Defendants a two-week extension of time to file a motion for reconsideration.

The Court's continued attention to this matter is appreciated.

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Respectfully yours,

s/ William A. Scott

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